

EXHIBIT P



U.S. Department of Justice

Criminal Division

Fraud Section

August 16, 2023

Via FedEx

Re: **United States v. Constantinescu et al, No. 4:22-CR-00612**

Dear Counsel:

Enclosed please find a zip file containing discovery relating to the above-captioned matter. This is the 20th production of discovery. For security purposes, the password will be provided via e-mail. An index of the materials provided is enclosed.

This zip file, labeled "2023.08.16 Production 20", contains files that cover the following Bates ranges:

DOJ-PROD-0000365289 - DOJ-PROD-0000365747

We have enclosed information relating to Joseph Varani, which contains the preliminary processing of the defendants' social-media activity from Discord or Twitter and in many cases exceeds the scope of the material that was seized as part of the search warrants in this case. These underlying materials have already been produced to you. The other folders in this production also relate to miscellaneous files relating to likely trial witnesses. The enclosed materials, and any future discovery provided to you, may exceed the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law are provided voluntarily and solely as a matter of discretion.

In this production, the government may have provided, as a courtesy, material which is not discoverable under Rule 16, *Jencks*, *Giglio*, or *Brady*. The fact that certain non-discoverable materials are provided in no way obligates the government to provide all non-discoverable materials, and the fact that certain non-discoverable materials are provided should not be taken as a representation as to the existence or non-existence of any other non-discoverable materials.

By opening this production, you agree that the produced materials are sensitive and confidential, should be used only for purposes of the above-captioned case, and shall not be publicly disclosed unless in a way authorized by the court.

If you have any questions or concerns, please contact me at (202) 355-5704 or Scott.Armstrong@usdoj.gov.

Sincerely

/s/ Scott Armstrong

Scott Armstrong, Assistant Chief

John Liolos, Trial Attorney